

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

The Application Of Kentucky Industrial Utility)	
Customers, Inc. For A Declaratory Order Finding	g)	
That the Commission Has Jurisdiction To Regula	ate)	Case No. 2013-00090
Kentucky Power's Participation In The)	
AEP Power Coordination Agreement)	

Kentucky Power Company moves the Commission for a sixty day extension until May 26, 2013 in which to file its response to the application of Kentucky Industrial Utility Customers, Inc. for a declaratory order. KIUC's motion subsequently was joined by the Attorney General. Kentucky Power states in support of its motion:

- 1. KIUC filed its motion for a declaratory order on March 6, 2013. The subject of KIUC's application is the Power Coordination Agreement currently pending before the Federal Energy Regulatory Commission. KIUC, the Attorney General, the Kentucky Public Service Commission, and others have intervened in the FERC proceeding.
- 2. Pursuant to 807 KAR 5:001, Section 18(4) the Company's response is due on March 27, 2013.
- 3. Kentucky Power and the other parties to the proposed Power Coordination Agreement have been engaged in negotiations concerning amendments to the agreement.
- 4. If a satisfactory amended Power Coordination Agreement can be filed at FERC counsel for KIUC has indicated that KIUC anticipates withdrawing its application in this proceeding without prejudice.
- 5. The requested extension will provide sufficient time to conclude the negotiations concerning the Power Coordination Agreement and file a satisfactory amended agreement with

FERC. Conversely, if the negotiations prove unsuccessful the extension will provide sufficient time for Kentucky Power to prepare its response following the conclusion of negotiations.

- 6. The requested extension will conserve the resources of the Commission and the parties to this proceeding if the application is withdrawn. The request for extension is made in good faith and not for purposes of delay. Kentucky Power believes the extension will not prejudice the parties or the Commission.
- 7. KIUC and the Attorney General have authorized Kentucky Power to state to the Commission that they have no objections to the requested extension.

Wherefore, Kentucky Power Company respectfully requests the Public Service Commission enter an order extending until May 26, 2013 the period for Kentucky Power to file its response to the March 6, 2013 application of Kentucky Industrial Utility Customers, Inc.

Respectfully submitted,

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COUNSEL FOR KENTUCKY POWER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by e-mail transmission and first class mail, postage prepaid, upon the following parties of record, this 21st day of March, 2013.

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